the direct sales curtailment issue but inconsistently maintain that the jurisdictional issue necessarily decided by that court with respect to the intrastate nature of United's Green System should be reviewed only on the procedural issue of exhaustion of remedies.

Louisiana exports over 73% of its total production to other states on a net delivery basis.[1] It delivers to other states 47.9% of all natural gas exported by producing states to meet the needs of other states which cannot supply their own requirements. Louisiana's economy is heavily dependent upon the availability of a firm, reliable and uninterrupted supply of natural gas.

In 1970, United supplied 47.5% of all natural gas consumed within the state. United is the predominant supplier of gas to United Gas, Inc., which owns and operates eighty-four distribution systems in Louisiana. United itself directly serves sixty-three privately-owned and municipally-owned resale customers in Louisiana. Some 380 cities and towns and 92 industrial customers in Louisiana are wholly dependent upon it for their natural gas requirements. Approximately 2,219,000 Louisiana residents are equally dependent upon United for gas used for space heating, cooking and water heating.

Louisiana believes that its interest is of a different nature than that of the other amici and, in the event, cannot be adequately and fully represented by the one of ninety-two direct industrial customers in the State.

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[1] After subtracting interstate receipts from interstate gross deliveries.

For the foregoing reasons, Louisiana respectfully requests that if and the FPC be alloted equal time to orally argue their respective positions.

Respectfully submitted,

The Hon. John J. McKeithen
Governor of the State of Louisiana
State Capitol Building
Baton Rouge, Louisiana

Hon. Jack P. F. Gremillion
Attorney General of the State of
Louisiana
State Capitol Building
Baton Rouge, Louisiana

Fred G. Benton, Sr.
Benton & Moseley
114 St. Louis Street
Baton Rouge, Louisiana 70801

Arnold D. Berkeley
Suite 1200, 1819 H Street, N.W.
Washington, D.C. 20006

Attorneys for
State of Louisiana
Amicus Curiae